

IN THE DRAWINGS:

Please add to the application Fig. 6 on the New Sheet appended hereto.

REMARKS

The Office Action of December 12, 2008 has been carefully considered.

Objection has been raised to the drawings based on the failure to show the locking member and the coupling members. A new Fig. 6 has been submitted, showing an enlargement of the coupling between the connecting hose and the ejector, including a male member and a female member, as is standard in the art. The drawing does not show details of the mechanism, since the details are not important to the invention, as long as the mechanism is operable by an ROV by rotational or axial movement. Such quick-connect devices are well known in the art, disclosed for example in US 5063965 and US 3997197, and manufactured by companies such as Snap-Tite and Parker Hannifin.

Claims 14-17 and 19-20 have been rejected under 35 USC 103(a) over Jacobsen et al in view of Flesen, and claims 18 and 22-23 have been rejected under 35 USC 103(a) over Jacobsen et al in view of Flesen and Edvardsen.

The Office Action alleges that Applicants' argument amount to a general allegation that the claims define a patentable invention without specifically pointing out how the claims are patentably distinguished from the references.

Accordingly, Applicants point out that the invention is specifically directed to placement of a rapid-connect coupling operable by an ROV between the pump and the ejector, to enable simple replacement of the entire ejector-hose unit. No such coupling operable by an ROV can be found in any of the cited references.

At the top of page 4, the Office Actions states that "the combination may not show the use of a selective rapid coupling means including a first locking member operable for locking and unlocking the first and second coupling parts by at least

one of a rotational and axial movement which can be performed by an ROV. However, applicant has stated on page 4, lines 5+, that this arrangement is not important, thus not patentably distinct, in which the Examiner takes official notice that it is well known [sic] in the art."

What Applicants actually said was that:

Typically the coupling 11 will be of a type commonly referred to as a rapid coupling. The construction of the coupling 11 as such is not important, though it will generally comprise a locking member that on a short rotating movement or a simple axial movement provides for a sealed locking of the coupling parts 11a and 11b to each other. The locking member will typically be operable by the common, external manipulators arranged on an ROV. The second coupling 12 may be of the same type as coupling 11 or of another type.

The specific structure of the rapid connect members is thus not important, *as long as they are rapid connect members operable by an ROV*. Applicants have not invented the rapid connect coupling; they have placed a rapid connect coupling in a novel manner, not heretofore disclosed, between a pump and an ejector, for removing subsea rocks and sediments.

Neither Jacobsen et al nor Flesen specifically discloses placement of a connector of any sort between the pump and the ejector, much less a rapid connect connector. Indeed, in Flesen, there is shown a pump 38 and a pipe bend 40, but the pipe bend 40 appears to be no more than an extension of the pump 38. Hose 32 and pipeline 40 do appear to have connectors therein, although there is no specific description of these connectors, and no suggestion that rapid connect connectors should be used. Moreover, these connectors are in a location which is different from the connectors of the invention.

Thus, contrary to the allegation made in the Office

Action, Flesen does not show a selective coupling arrangement, and there is no suggestion in these references to include a selective coupling arrangement for what is alleged to be a "predictable benefit." If such a benefit is predictable, why is the use of rapid coupling devices not disclosed in any of the cited references?

The Edvardsen patent has been cited to show a discharge hose connected to the outlet side of the ejector so that sediment can be transported further away from the borehole. However, Edvardsen also does not suggest the use of selective rapid couplings, as is presently claimed.

As the use of selective rapid couplings is not disclosed or suggested in any of the cited references, it cannot be obvious to place them between a pump and an ejector as is presently claimed, and withdrawal of these rejections is requested.

A minor corrective amendment has been made to the specification on page 4, and a description of Fig. 6 has been added.

In view of the foregoing amendments and remarks, Applicants submit that the present application is now in condition for allowance. An early allowance of the application is earnestly solicited.

Respectfully submitted,



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